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August 6, 2008

Honorable Denny Chin  
United States District Judge  
U. S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Via Fax (212) 805-7906

Re: MAN Ferrostaal, Inc. n/k/a Ferrostaal Metals Group,  
Inc. v. M/V GROUSE ARROW et al.  
07 CIV 10439 (DC)  
08 Civ. 0219 (DC)  
Our Ref: FS 7950, 7950B, 7911

Hon. Sir:

We are attorneys for plaintiff in the above two consolidated matters before Your Honor, and write with the consent of defendants' attorneys, copied below, to request an additional 60 days to complete discovery and to re-schedule the pre-trial conference, now on for August 8 at 10:00 a.m., to October 8, 2008, at 10:00 a.m., or other date and time convenient to the Court. This is the first request for extensions of time.

Discovery is currently due by August 8, 2008. Plaintiff's Rule 26(a) disclosures and documents have been served and the Gearbulk defendants have provided security for plaintiff's claims herein without the need for a Rule B procedure.

Settlement negotiations have been initiated and plaintiff has noticed a *de bene esse* deposition of plaintiff's representative for August 21, 2008, in New York, in the event settlement discussions are not concluded.

The parties' attorneys therefore respectfully request an extension of the

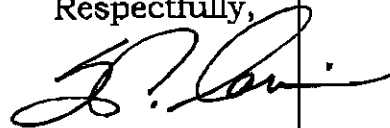
Application GRANTED. The  
8/8/08 PTC is adjourned until  
10/10/08 at 10 a.m. All discovery

shall be complete by then. 8/7/08  
Calkins

discovery deadline to October 8, 2008, and an adjournment of the pre-trial conference from August 8 at 10:00 a.m. to October 8 at 10:00 a.m.

Thank you.

Respectfully,



SPC/

cc: Blank Rome LLP  
Attorneys for Defendants  
405 Lexington Ave.  
New York, NY 10174-0208  
(212) 885-5000  
Attn: Jeremy Harwood, Esq.

**Via Fax (212) 885-5001**